

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

GREGORY COLBURN, et al.,

Defendants.

Case No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S ASSENTED-TO
MOTION TO SEAL HIS MOTION TO EXCLUDE
KNOWN FALSE EVIDENCE REGARDING JOVAN VAVIC**

Defendant John Wilson moves to file under seal his Motion to Exclude Known False Evidence Regarding Jovan Vavic (the "Motion"), and accompanying exhibits. The Motion, a redacted version of which will be filed on the public record, attaches as exhibits portions of (1) an FD-1023 Confidential Human Source report, and (2) the Probation Department's presentence investigation report for a third party, Devin Sloane, in a case before Judge Talwani.¹ The Motion also quotes from and refers to those documents. The Government assents to this Motion to Seal.

WHEREFORE, Wilson respectfully requests the Court allow him to file under seal his Motion to Exclude Known False Evidence Regarding Jovan Vavic, and accompanying exhibits.

Dated: August 31, 2021
Boston, Mass.

¹ Wilson has obtained permission from counsel for Mr. Sloane to use, in these proceedings, the PSR excerpts at issue.

Respectfully submitted,

Counsel for John Wilson,

/s/ Michael Kendall

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1

I hereby certify that, before filing this motion, defense counsel attempted in good faith to confer with the government to resolve or narrow the issues. The government has assented to this motion.

/s/ Michael Kendall

CERTIFICATE OF SERVICE

I, Michael Kendall, hereby certify that on August 31, 2021, this document, filed through the CM/ECF system, will be sent electronically to all registered participants in this matter as identified on the Notice of Electronic Filing (NEF).

/s/ Michael Kendall